

# **LUNDBERG LAW FIRM, P.L.C.**

PAUL D. LUNDBERG  
ATTORNEY AT LAW

600 4<sup>TH</sup> STREET, SUITE 906  
SIOUX CITY, IA 51101  
TELEPHONE 712-234-3030  
TELECOPIER 712-234-3034  
Email: paul@lundberglawfirm.com  
www.lundberglawfirm.com

LICENSED IN IOWA  
NEBRASKA AND  
SOUTH DAKOTA

**REDACTED - FOR PUBLIC INSPECTION**

**VIA ECFS**

May 5, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th St., N.W.  
Room TW-A325  
Washington, DC 20554

**Re: Request for Review of a Decision of the Universal Service Administrator and Request for Confidential Treatment; WC Docket No. 06-122**

Dear Ms. Dortch:

Aventure Communication Technology, L.L.C. ("Aventure") is providing with this letter a Request for Review of a Decision of the Universal Service Administrator ("Request") and within this letter a request for confidential treatment of certain portions of the request and supporting documents.

## Request for Confidential Treatment

Aventure, pursuant to 47 C.F.R. §§0.457, 0.459, asks that portions of its Request be treated as confidential and not subject to public inspection. Certain portions of the Request as identified further below contain confidential and proprietary information that, if subject to public disclosure, would cause significant commercial and competitive harm to Aventure. As described below, Aventure's request satisfies the standards of grant of this request as set forth in Sections 0.457 and 0.459 of the Commission's Rules.

In accordance with Section 0.459(b) and in support of its request, Aventure provides the following information:

(1) Identification of Confidential Materials: Aventure seeks confidential treatment of the amount claimed due from Aventure in USAC Audit No. HC2011BE011 dated May 15, 2012, and as further disclosed in the Administrator's decision of October 29, 2013, Aventure's appeals within USAC, and action letters to Aventure from USAC, all of which are attached to the Request. (Attachments 1-5) The non-redacted version of the Request has been marked with the

annotation "Confidential - Not for Public Disclosure or Inspection". Specifically, information on the amount claimed due by USAC that is designated as confidential, or appropriately marked "Begin Confidential" and "End Confidential" in the Request. Attachments 1 through 5 have been redacted accordingly. A "Redacted - For Public Inspection" version of the Request and the accompanying attachments intended for public inspection is being filed simultaneously in the Commission's Electronic Filing System.

(2) Circumstances Giving Rise to Submission of Information: Aventure requests that specific information in the Request be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. The information designated as confidential includes the USAC Final Audit Report and information regarding Aventure's USAC contribution amount and the degree to which such amount would change based on USAC's recommendations. The information is competitively sensitive information that Aventure maintains as confidential and is not normally made available to the public. Release of the information would have a substantial negative impact on Aventure since it would provide competitors with commercially sensitive information.

(3) Degree to Which Information is Commercial or Financial: The information designated in the Request and in the Attachments as Confidential is of a highly sensitive commercial nature, containing non-public financial information concerning aspects of Aventure's business.

(4) How Disclosure Could Result in Substantial Harm: Disclosure of Aventure's confidential information regarding its USAC contributions, payments from USAC, or amount claimed due from Aventure in the USAC audit would give competitors a significant advantage by revealing sensitive business information about Aventure's business relationships and revenues.

(5) Measures Taken to Prevent Disclosure: The Request and Attachments provide information relating to Aventure's contractual and financial operations. Aventure holds all such information designated as "**CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE OR INSPECTION**", within the Request and Attachments in strict confidentiality and does not permit access to such information to any persons other than employees who require access to this information for the specific purpose of conducting business on behalf of Aventure.

(6) Public Access to Information, Third Party Disclosure: As noted above, Aventure has not made this information publicly available through any previous disclosures.

(7) Justification of the Period During Which the Material Should Not be Publicly Available: Aventure requests that the Commission hold this information out of public view, and cannot determine at this time any date on which this information should not be considered confidential.

(8) Additional Information: Because of the competitively sensitive nature of this information, Aventure respectfully requests that the Commission treat this filing as confidential and withhold the same from public inspection. Aventure has simultaneously filed a copy of the

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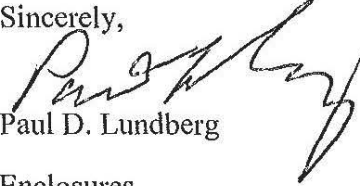
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filing marked "**REDACTED - FOR PUBLIC INSPECTION**" so that the non-confidential information contained in the filing may be made available to the public.

Please contact the undersigned should you have any questions concerning the attached documentation, or Aventure's request for confidentiality pursuant to the Commission's rules. An original and four (4) copies of the confidential version of the Request are enclosed.

A copy of this Request is also being provided to the Universal Service Administrative Company as is represented in the certificate of service appended to the Request.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul D. Lundberg", written over the printed name.

Paul D. Lundberg

Enclosures